

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

United States Courts
Southern District of Texas
FILED
MAY 20 2008
Michael N. Milby, Clerk of Court

In re:

JOINTLY ADMINISTERED

SCOTIA DEVELOPMENT LLC, *et al.*,

Case Nos. 07-20027--07-20032

Debtors

Chapter 11

**CLAIMANT'S ANSWER TO DEBTORS' OBJECTION
TO PROOF OF CLAIM #547 FILED BY PATRICK LANCELIN**

Creditor and claimant, Patrick Lancelin, files this answer to the objection, filed on 04/07/08, by the debtors to his Proof of Claim filed on 07/17/07, and, in support thereof, respectfully states as follows:

1. The debtors object that my claim is based on a tort action in the Superior Court of California in the County of Humboldt, Case No. 9700400. They are right about that, but they are wrong in saying that action has been dismissed. In ¶ 12 on page 5 of the debtors' objection, they state the following:

12. On April 13, 2001, the state court . . . dismissed Claimant's lawsuit . . . for willfully failing 'to comply with his discovery obligations . . . established by the court order of May 19, 2000.' A copy of the order is attached hereto as 'Exhibit B.' . . .

However, no such order is attached as "Exhibit B"! Perhaps that is because my lawsuit against the debtors has not been dismissed!

2. Among the plaintiffs in that tort action in California are listed Simone Rust, my mother, and Patrick Lancelin, myself. The fact that my mother, Simone Rust, executed and filed an Acknowledgment Of Full Satisfaction Of Judgment on 06/22/01 is irrelevant to my continuing and still pending action in the Superior Court of California against the debtors. The debtors claim that I was not an owner of the property that was the basis for the lawsuit. They claim that only my mother, Simone Rust, owned that property. But that is not true. My mother, Simone Rust, and I were joint owners of that property.

3. The debtors object that I did not provide this court with supporting documents to my Claim Form B10, as required by item 7 of that form. However, in their very objection, they have now conveniently provided this court with exactly such documents. In regard to the date the debt was incurred, they object that my statement of the date as "96→07" is inadequate; but that is a factual matter for this court to decide after hearing what I have to say on this matter. It is not for them to decide ahead of time.

WHEREFORE, this creditor and claimant respectfully requests that this court sustain his claim and deny the debtors' objection.

Date: 05/18/08


PATRICK LANCELIN

PROOF OF SERVICE BY OVERNIGHT MAIL

I, RICHARD K. HARRINGTON, declare as follows:

1. I am a resident of the County of Santa Cruz, State of California. I am over the age of 18, and not a party to this action.

2. On May 18, 2008, I caused the following documents:

CLAIMANT'S ANSWER TO DEBTORS' OBJECTION TO PROOF OF CLAIM #547

FILED BY PATRICK LANCELIN

AN UNSIGNED COPY OF THIS PROOF OF SERVICE

to be served on all parties by examining the documents, placing them in envelopes, and mailing them by overnight, Federal Express, mail addressed as follows:

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Eric J. Fromme
GIBSON, DUNN, & CRUTCHER LLP
Forty-Seventh Floor
200 Park Avenue
New York, NY 10166-0193

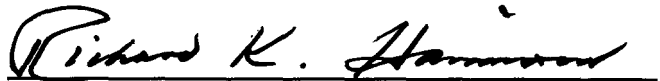
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true, and that this declaration is executed on May 18, 2008, at Santa Cruz, California.

Date: May 18, 2008


RICHARD K. HARRINGTON